

MICHAEL BEEDE, ESQ.
Nevada Bar No. 13068
JAMES W. FOX, ESQ.
Nevada Bar No. 13122
THE LAW OFFICE OF MIKE BEEDE, PLLC
2470 St. Rose Pkwy, Suite 307
Henderson, NV 89074
T: 702-473-8406
F: 702-832-0248
eservice@LegalLV.com
Attorneys for Defendant/Counterclaimant, Premier One Holdings, Inc

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

WELLS FARGO BANK, N.A., AS
TRUSTEE FOR THE CERTIFICATE-
HOLDERS OF THE MLMI TRUST,
MORTGAGE LOAN ASSET-BACKED
CERTIFICATES, SERIES 2006-HE1,

Plaintiff,

vs.

SPRING MOUNTAIN RANCH MASTER
ASSOCIATION; NEVADA ASSOCIATION
SERVICES, INC.; PREMIER ONE
HOLDINGS, INC.; and WV
INTERNATIONAL, INC.,

Defendant.

PREMIER ONE HOLDINGS, INC
Counterclaimant,

vs.

WELLS FARGO BANK, N.A., AS
TRUSTEE FOR THE CERTIFICATE-
HOLDERS OF THE MLMI TRUST,
MORTGAGE LOAN ASSET-BACKED
CERTIFICATES, SERIES 2006-HE1,
BEATRICE V. VATTIMA, MICHAEL A.
VATTIMA, DOES 1 THROUGH 10,
INCLUSIVE, AND ROE BUSINESS
ENTITIES 1 THROUGH 10

Counter - Defendants.

CASE NO. 2:16-cv-01591-GMN-EJY

**STIPULATION AND ORDER TO
EXTEND REPLY IN SUPPORT
DEADLINE FOR MOTIONS FOR
SUMMARY JUDGMENT [ECF
NOS. 64, 65, 66]**

(FIRST REQUEST)

1 Plaintiff/Counterdefendant Wells Fargo Bank, N.A., as Trustee for the Certificateholders
2 of MLMI Trust, Mortgage Loan Asset-Backed Certificates, Series 2006-HE1 (hereafter
3 “Plaintiff,” or “Wells Fargo), by and through its attorneys of record, Melanie D. Morgan, Esq.
4 and Donna M. Wittig, Esq., of Akerman, LLP, Defendant Spring Mountain Ranch Master
5 Association (hereafter “Spring Mountain”), by and through its attorneys of record, Sean L.
6 Anderson, Esq. and T. Chase Pittsenbarger, Esq., of Leach Kern Gruchow Anderson Song, and
7 Defendant/Counterclaimant Premier One Holdings, Inc. (hereafter “Premier One”), by and
8 through its attorneys of record, Michael N. Beede, Esq. and James W. Fox, Esq., of The Law
9 Office of Mike Beede, PLLC, hereby stipulate to extend the time for parties to file replies in
10 support for all pending Motions for Summary Judgment [ECF Nos. 64, 65, 66], by **three days to**
11 **September 5, 2019**. The current deadline for each party to file its reply is September 2, 2019.
12 However, September 2, 2019 is Labor Day, a Federal holiday. The extension is necessary to avoid
13 any potential confusion about attempting to file any pertinent documents on a day when the courts
14 will be closed in observance of a Federal holiday. The parties have agreed to a mutual extension
15 of all deadlines in the interest of fairness and professional courtesy. Therefore, the parties agree
16 that good cause supports an extension and the extension is not for purposes of delay or any other
17 bad faith purpose. This is the first request for an extension of the deadline to file replies in support
18 for these Motions. The parties had previously requested an extension of the deadline to file any
19 Response to competing Motions for Summary Judgment.

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1 The new deadline for each party to file a Reply in Support of Spring Mountain Ranch
2 Master Association's Motion for Summary Judgment [ECF No. 64]; Premier One Holdings, Inc.'s
3 Motion for Summary Judgment [ECF No. 65]; and Wells Fargo's Motion for Summary Judgment
4 [ECF No. 66] be extended by three days to **Thursday, September 5, 2019.**

5 IT IS SO STIPULATED.

6
7 DATED this 26th day of August, 2019.

DATED this 26th day of August, 2019.

8 THE LAW OFFICE OF MIKE BEEDE, PLLC

AKERMAN, LLP

9 By: /s/ Michael Beede, Esq.

By: /s/ Donna M. Wittig, Esq.

10 MICHAEL BEEDE, ESQ.

MELANIE D. MORGAN, ESQ.

11 Nevada Bar No. 13068

Nevada Bar No. 8215

12 JAMES W. FOX, ESQ.

DONNA M. WITTIG, ESQ.

13 Nevada Bar No. 13122

Nevada Bar No. 11015

2470 St. Rose Pkwy, Suite 307

1635 Village Center Circle, Suite 200

14 Henderson, NV 89074

Las Vegas, NV 89134

15 T: 702-473-8406

T: 702-634-5000

*Attorneys for Premier One Holdings,
Inc.*

*Attorneys for Wells Fargo Bank, N.A., as
Trustee for the Certificateholders of MLMI
Trust, Mortgage Loan Asset-Backed
Certificates, Series 2006-HE1*

16
17 DATED this 26th day of August, 2019.

18 LEACH KERN GRUCHOW ANDERSON SONG

19 By: /s/ T. Chase Pittsenbarger, Esq.

20 SEAN L. ANDERSON, ESQ.

21 Nevada Bar No. 7259

T. CHASE PITTSBARGER, ESQ.

22 Nevada Bar No. 13740

2525 Box Canyon Drive

23 Las Vegas, NV 89128

T: 702-538-9074

24 *Attorneys for Spring Mountain Ranch
Master Association*

Case Name: Wells Fargo Bank, N.A. v. Spring
Mountain Ranch Master Association, et al.
Case Number: 2:16-cv-01591-GMN-EJY

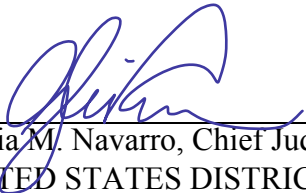
ORDER

The Court, having reviewed the stipulation of the parties, and good cause appearing
therefore,

IT IS HEREBY ORDERED that the time for each party to file a Reply in Support
of Spring Mountain Ranch Master Association's Motion for Summary Judgment [ECF No. 64];
Premier One Holdings, Inc.'s Motion for Summary Judgment [ECF No. 65]; and Wells Fargo's
Motion for Summary Judgment [ECF No. 66] be extended by three days. The new deadline for
any replies shall be September 5, 2019.

IT IS SO ORDERED.

DATED this 29 day of August, 2019.



Gloria M. Navarro, Chief Judge
UNITED STATES DISTRICT COURT

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and that I am not a party to, nor interested in, this action. On the 26th day of August, 2019, I did cause a true and correct copy of the foregoing **STIPULATION AND [PROPOSED] ORDER TO EXTEND REPLY IN SUPPORT DEADLINE FOR MOTIONS FOR SUMMARY JUDGMENT [ECF NOS. 64, 65, 66]** to be served upon all parties involved in this litigation by the method indicated:

☐ U.S. Mail

☐ U.S. Certified Mail

☐ Facsimile Transmission

☐ Federal Express

☒ Electronic Service via CM/ECF

☐ E-Mail

By: /s/ Amanda Abril
An Employee of The Law Office of Mike Beede, PLLC